

RECEIVED USDC
CLERK, CHARLESTON, SC
2023 APR -5 PM 2:02

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

FANNIE MAE,

Plaintiff,

v.

AMELIA AID PROPCO LLC, *et al.*¹¹

Defendants.

§
§
§
§
§
§
§
§
§

MISC. ACTION NO. _____

**NOTICE OF RECEIVERSHIP PROPERTY
LOCATED IN THIS DISTRICT PURSUANT TO 28 U.S.C. § 754**

Michael F. Flanagan, the court-appointed Receiver in the above-captioned matter pending in the United States District Court for the District of Columbia, Case No. 1:23-cv-00862 (the “Main Case”), hereby files copies of the following documents pursuant to 28 U.S.C. § 754:

Exhibit 1: Complaint [Main Case, Docket No. 1]; and

Exhibit 2: Agreed Order Appointing Receiver [Main Case, Docket No. 6] (the “Receivership Order”).

The Receiver notifies all parties-in-interest that the Receivership Estate¹² includes property located in this District, including all tangible and intangible assets of each of the above-captioned Defendants; all tangible and intangible assets used by the Defendants or the Existing Operators for the operation of the Properties; all real and personal property owned, leased or otherwise in the possession of the Defendants; the Properties and all offices owned, leased or occupied by the Defendants or the Existing Operators and/or the Existing Managers at the Properties (together with

¹¹ A complete list of Defendants in the Main Case is included in the Complaint attached as **Exhibit 1**.

¹² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Receivership Order. Additionally, a specific listing of the real property belonging to the Receivership Estate is identified in the Receivership Order.

the Properties, the “Receivership Premises”); and all rents, funds, bank accounts, litigation claims, accounts receivable, computers, all media on which information is stored electronically, vehicles, equipment, inventory, furniture, furnishings, licenses, permits, books, records, and documents, but excluding any “Privileged Communications.”

All future filings in connection with this matter will be made in the Main Case.

Respectfully submitted this 4th day of April, 2023.

GRAY REED

By: /s/ London England

Jason S. Brookner
Texas State Bar No. 24033684
Amber M. Carson
Texas State Bar No. 24075610
London England
Texas State Bar No. 24110313
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: jbrookner@grayreed.com
acarson@grayreed.com
lengland@grayreed.com

**COUNSEL FOR MICHAEL F. FLANAGAN,
RECEIVER**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of April, 2023, she caused a true and correct copy of the foregoing miscellaneous action to be filed in accordance with the local rules of this District and a copy will be delivered via mail to all Defendants residing in this district.

/s/ London England

London England